

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

KASEY D. ALVES

PLAINTIFF

VERSUS

CAUSE NO.: 1:06cv912 LG-JMR

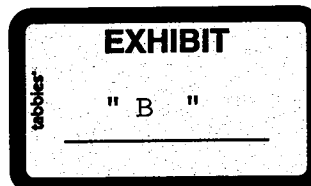
HARRISON COUNTY MISSISSIPPI, BY AND  
THROUGH THE BOARD OF SUPERVISORS;  
HARRISON COUNTY SHERIFF'S DEPARTMENT;  
SHERRIFF GEORGE PAYNE, JR.; DAVID DECELLE;  
HEALTH ASSURANCE, LLC; REGINA RHODES,  
OFFICIALLY AND IN HHER INDIVIDUAL CAPACITY;  
RYAN TEEL, IN HIS OFFICIAL AND INDIVIDUAL  
CAPACITY; DIANNE GASTON-RILEY, OFFICIALLY AND  
IN HER INDIVIDUAL CAPACITY, and UNKNOWN JOHN  
AND JANE DOES A-Z, IN THEIR OFFICIAL AND  
INDIVIDUAL CAPACITIES

DEFENDANTS

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED TO DEFENDANT,  
HARRISON COUNTY SHERIFF'S DEPARTMENT  
AND SHERIFF GEORGE PAYNE, JR.

COMES NOW the Plaintiff, by and through counsel, and pursuant to F.R. Civ. P. 33, requests that the following documents, as defined comprehensibly by the Rule, be produced for Plaintiff's inspection and copying, at a time, place and manner which may be agreed upon by the parties. The Defendant is expressly requested to supplement his response to this Request for Production of Documents by immediately producing for inspection and copying by the Plaintiff, any document requested below that comes into his possession or subject to it's control subsequent to the date upon which documents are produced pursuant to this request. The Plaintiff requests production as follows:

REQUEST NO. 1: A copy of each and every document in your possession which may lead



to discoverable evidence in this cause.

**REQUEST NO. 2:** A copy of each and every document you intend to introduce at the trial of this cause.

**REQUEST NO. 3:** A copy of any and all statements purportedly made by the Plaintiff to the Defendant.

**REQUEST NO. 4:** A copy of all reports in your possession conducted by any person, individual, or agency which detail or summarize findings, observations, or notes concerning the occurrence giving rise to this litigation.

**REQUEST NO. 5:** A copy of all statements, tape recordings, video tapes, photographs or similar evidence in the possession of the Defendant relating in any manner to the Plaintiffs.

**REQUEST NO. 6:** A copy of any liability insurance policy which provides the Defendant with primary liability insurance coverage, excess liability insurance coverage, or re-insurance coverage for negligent acts or omissions alleged in the Complaint.

**REQUEST NO. 7:** Produce a copy of any document that is responsive to any interrogatory propounded to you.

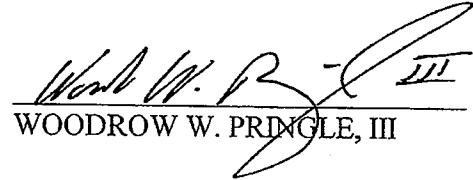
**REQUEST NO. 8:** The personnel files of all individuals who were terminated, resigned or otherwise lost their employment as a result of the incident that is the subject of this litigation.

**REQUEST NO. 9:** Produce a copy of the videotape or other recording of the incident that occurred at the Harrison County Detention Facility on the date alleged in the Complaint.

**RESPECTFULLY SUBMITTED** this the 27 day of October, 2006.

KASEY D. ALVES

BY:

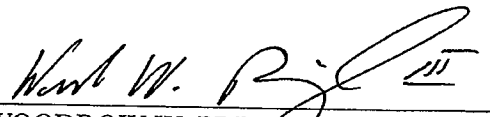
  
WOODROW W. PRINGLE, III

**CERTIFICATE OF SERVICE**

I, WOODROW W. PRINGLE, III, certify that I have this date forwarded by United States Mail, postage prepaid, a true and correct copy of the above and foregoing PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS to the following at their usual mailing address:

Cy Faneca, Esq.  
Attorney at Law  
P.O. Drawer W  
Gulfport, Mississippi 39502

This the 24 day of October, 2006.

  
WOODROW W. PRINGLE, III

WOODROW W. PRINGLE, III  
ATTORNEY AT LAW  
MS. BAR NO. 4513  
2217 PASS ROAD  
GULFPORT, MISSISSIPPI 39501  
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